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May 8, 2024

BY ECF

Honorable Edgardo Ramos
United States District Judge
Southern District of New York
40 Foley Square, Courtroom 619
New York, NY 10007

Re: Franklin Mendez v. Molly W. Park et ano., 24-cv-2486-ER

Dear Judge Ramos:

This office represents Molly Park, Commissioner of the New York City Department of Social Services, and the City of New York in the above-captioned action. I write respectfully to request an extension of approximately 45 days to respond to the Complaint in this matter from the original date of May 13, 2024, until June 27, 2024.¹ If granted, the extension will enable my office to adequately address the allegations in the Complaint. At this time, Defendants anticipate filing a motion to dismiss the Complaint. This is Defendants' second request for an extension in this matter. Your Honor granted Defendants' first request to respond to Plaintiffs' motion for a preliminary injunction. No other existing deadlines in the case would be impacted by the requested extension. *Pro se* Plaintiff consents to this request.

Thank you for Your Honor's consideration of this request.

¹ I have calculated May 13, 2024 to be the original date to respond to the Complaint because Ms. Park was served with the Summons and Complaint at the offices of the Department of Social Services on April 22, 2024. However, the City of New York has not been properly served at 100 Church Street, New York, NY 10007.

Respectfully submitted,



Jaimini A. Vyas
Assistant Corporation Counsel

cc: **By ECF and email**

Pro se Plaintiff
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Help USA Shelter
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New York, NY 10035

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

FRANKLIN MENDEZ,

Plaintiff,

-against-

MOLLY WASLOW PARK, COMMISSIONER OF
NEW YORK CITY DEPARTMENT OF SOCIAL
SERVICES, and THE CITY OF NEW YORK,

Defendants.

Case No. 24-cv-2486-ER

CERTIFICATE OF SERVICE

I, Jaimini Vyas, declare under penalty of perjury and, pursuant to 28 U.S.C. § 1746, that I served upon *pro se* Plaintiff, Mr. Franklin Mendez, with his consent, at his email address fmendez3327@gmail.com, a copy of Defendants' letter request for an extension of 45 days to response to the Complaint filed in this action from the original date of May 13, 2024, to June 27, 2024.

Dated: May 8, 2024
New York, New York

HON. SYLVIA O. HINDS-RADIX
Corporation Counsel of the City of New York
Attorney for Defendants
100 Church Street
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By:



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